

THE HON. JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

This filing relates to:
ALL ACTIONS

No. 2:21-cv-00563-JNW

**DECLARATION OF GARY E. MASON
IN SUPPORT OF REPLY BRIEF IN
SUPPORT OF PLAINTIFF RYAN
LALLY'S MOTION FOR SANCTIONS**

I, Gary E. Mason, declare under penalty of perjury that the following statements are true and correct:

1. I am a partner at the law firm of Mason LLP. Mason LLP represents Plaintiff Ryan Lally and thousands of other subscribers to Valve's gaming platform, Steam, with antitrust claims against Valve (the "Claimants"). I submit this declaration in support of Plaintiff Ryan Lally's Reply Brief in Support of Lally's Motion for Sanctions.

2. On February 22, 2024, the American Arbitration Association ("AAA") notified myself and counsel for Valve that Ryan Lally's arbitration claim and 14,910 others concurrently filed met the threshold of a Multiple Case Filing group under AAA rules. Therefore, AAA advised,

DECL. OF GARY E. MASON
IN SUPP. OF REPLY IN SUPP. OF
MOT. FOR SANCTIONS
CASE NO. 2:21-CV-00563-JNW

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the 14,911 filings are subject to AAA's Mass Arbitration Supplementary Rules (Effective August 1, 2023). Attached as **Exhibit 1** is a true and correct copy of the AAA Mass Arbitration Supplementary Rules (Effective August 1, 2023).

3. On February 14, 2025, I sent a letter to Cheryl Florio, AAA Director of ADR Operations, to: 1) notify AAA that a formal mediation between Valve and the Claimants ended at an impasse; 2) follow-up on a July 2024 letter from AAA requesting the parties' input on the appointment and scheduling processes for merits and process arbitrators; and 3) respond to a letter Valve sent AAA on February 13, 2025, ECF No. 470-10, in which it urged AAA to close 19,911 filed arbitrations. Attached as **Exhibit 2** is a true and correct copy of my February 14, 2025, letter.

I declare under penalty of perjury under the laws of the United States that the above is true and correct to the best of my knowledge.

Executed on July 2, 2025, in Bethesda, Maryland.



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